

ASSET REGISTER

INTRODUCTION

This is an information asset register.

This document helps comply with the GDPR's accountability principle. This requires our business to be able to show how you comply with the GDPR principles, for example by having effective procedures and guidance for staff.

This document may be made available to the ICO on request.

COMPLIANCE

We have fewer than 250 employees so we only need to keep these records for processing activities that:

1. are not occasional
2. could result in a risk to the rights and freedoms of individuals or
3. involve the processing of special categories of data or criminal conviction and offence data

We have therefore recorded the following:

1. the name and details of your business
2. each controller you are acting on behalf of
3. the controllers' representative,
4. our representative
5. our data protection officer
6. categories of the processing carried out on behalf of each controller;
7. details of transfers to third countries
8. a general description of technical and organisational security measures.

1. Name & Business Details:

No Comment Legal Services Ltd
3 Rockleigh
Hertford
Hertfordshire SG14 1LS

No Comment is an agency. We take instructions from Criminal Law Firms. We then instruct independent police station representatives to attend upon defendants at the police station.

2. Controller List

The exact role we play is not wholly clear at present and we will continue to review our position. At present we take the view that we are a data controller and a joint data controller as well as being a data processor and a joint data processor.

When a firm instructs us we instruct a rep. But our role is not clear under GDPR and it will take time to fully understand how it will affect our business.

So for example our reps complete Legal Aid forms. Those forms are given to the instructing firm so they can apply to the LAA for funding. Clearly the LAA are the data controllers in that scenario as they determine both the means and purpose of the data collection.

However, when a rep collects information from a client it is not clear if he is acting as a controller or a processor. A self-employed rep is arguably a data

controller of a client's data. They are not simply data processors as they are not sub-contracting on the solicitor's behalf, merely processing data accordingly; instead they are providers of independent objective specialist advice and assistance. They are controllers and not processors as its up to the rep to determine what information to obtain and process for the task.

A full list of controllers is available to ICO upon request but is not publicly available.

3. Controllers' Representatives

A full list of controllers is available to ICO upon request but is not publicly available.

4. Our representative

Matthew Fresco Mat@NoComment.Law

5. Our Data Protection Officer

Matthew Fresco Mat@NoComment.Law

6. Categories of the processing carried out on behalf of each controller;

Storage of data only. Our reps write notes. We store the notes. The firms collect the notes either by downloading them from our secure website or by email.

Reps provide us with data either by email or by uploading it to our web portal. Both will occasionally write letters to us or send cheques. We do not process data in any real sense. However, GDPR states that processing includes storage and collection of data. We do not mine the data or use it for marketing. We do not track individuals it or use it for profiling.

Data is merely stored on behalf of our clients. We doubt our clients process that data in any meaningful way other than to give legal advice.

7. Details of transfers to third countries

None. All transfers are within the UK

8. Technical Security Measures

Most Data is stored electronically although some is on paper. Current digital data is held on a remote server. Archived data is held on a local machine which is offline. Access to the archived data is restricted.

Our server holds current data which is of immediate use. The data is not held on a cloud server. The server is based in the UK and we have a GDPR compliant contract with the hosting company, Tsohost (formerly VidaHost). The server is shared not dedicated. The data center is in Slough. We have an SSL certificate. The data center has a secure network infrastructure and does not rely on third-party solutions. The data center is staffed 24 hours a day every day of the year, with ultra-strict access control, extensive CCTV coverage, and online firewall protection.

Digital data is held in two forms. We have documents and information on a database. Paper is less common. We do not have any data relating to defendants on paper. We only have some invoices. These are held in our office.

All data is secure. It is encrypted and password protected.

/* NO COMMENT */

EVERY POLICE STATION, EVERY DAY!

Limited amounts of data are also held briefly on our mobile phone app. It is also briefly stored and transferred by telephone, sms text messaging and electronically via our mobile phone app. The app does not retain data.

DATA WE HOLD

Information is held where applicable so for example we do not have alternate telephone numbers for all reps. We hold the following information:

Police Station Reps:

1. Name
2. Address
3. Qualification
4. Company Name
5. PIN
6. Mobile No
7. Alternate Telephone Number
8. Email Address
9. Rate
10. Mileage Rate
11. VAT no
12. Bank
13. Bank Account Name
14. Sort Code
15. Account Number
16. Address
17. CV
18. App User
19. Username
20. Password
21. Notes
22. Signature
23. Instructions
24. Date Paid

Instructing Firms:

1. Name

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2. Primary Contact
3. DX Address
4. Postal Address
5. Website
6. Instructing Solicitor Names
7. Instructing Solicitor Telephone Numbers
8. Instructing Solicitor Email Addresses
9. Rate
10. DSCC Website Username and Password
11. Preferences and Special Instructions
12. Notes
13. Username and Password
14. Instructions
15. Date Paid
16. Instruction Travel, Wait and Attendance Times
17. Instruction Disbursements

Defendants:

1. Name
2. Instructing Firm
3. Date and Time of Instruction
4. Source
5. DSCC ref
6. Date of Birth
7. Address
8. Telephone Number
9. Email
10. Benefits or Income
11. NI No
12. Partner's Name
13. Partner's Email Address
14. Partner's Income
15. Venue
16. Custody Record Number
17. Offence
18. OIC name
19. OIC Telephone Number
20. OIC Email Address
21. Time of Arrest
22. Time of Arrival

/* NO COMMENT */
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23. Reason for Arrest
24. Reason for Detention
25. Complainant Name
26. Co-defendant Name
27. Disclosure
28. Instructions
29. Advice
30. Interview Notes
31. Disposal
32. Bail Conditions
33. Compliance Information
34. Signature